

Steven L. Krongold (State Bar No. 125952)  
**KRONGOLD LAW CORP., P.C.**  
8105 Irvine Center Drive, Suite 900  
Irvine, California 92618  
Phone: 949-651-1900  
Fax: 949-861-9225

Attorney for Defendants  
Debt Resolution Center, f/k/a Freedom Debt Center,  
Debt Resolution Center LP, and  
Nationwide Support Services, Inc.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

ANGEL MALAVE, an individual,  
  
Plaintiff,  
  
vs.

DEBT RESOLUTION CENTER, f/k/a  
FREEDOM DEBT CENTER, a California  
corporation, NATIONWIDE SUPPORT  
SERVICES, INC., a California  
corporation, and DOES 1 to 10,  
  
Defendants.

Case No. CV11-7371 R (JEMx)  
Hon. Manuel L. Real

**NOTICE OF MOTION AND  
MOTION TO DISMISS THIRD  
AMENDED COMPLAINT FOR  
FAILURE TO STATE A CLAIM  
FOR RELIEF**

**[Fed.R.Civ.Proc. 12(b)(6)]**

Date: April 2, 2012  
Time: 10:00 a.m.  
Ct rm: 8, Spring Street, 2nd Floor

1 TO PLAINTIFF AND TO HIS ATTORNEYS OF RECORD:

2 NOTICE IS HEREBY GIVEN that on April 2, 2012, at 10:00 a.m., or as soon  
3 thereafter as the matter may be heard, in Courtroom 8 of the above-entitled court,  
4 located at 312 North Spring Street, Los Angeles, California, Defendants Debt  
5 Resolution Center, f/k/a Freedom Debt Center, a California corporation, Debt  
6 Resolution Center LP, a California partnership, and Nationwide Support Services,  
7 Inc. (Defendants) will and hereby do move, pursuant to Federal Rule of Civil  
8 Procedure 12(b)(6), for an order dismissing the Third Amended Complaint (TAC)  
9 on grounds the complaint fails to set forth sufficient facts to state a plausible claim  
10 for relief for fraud and on grounds the complaint is barred by the one-year statute of  
11 limitations set forth in the Electronic Funds Transfer Act, 15 U.S.C. § 1693m(g).

12 The motion will be based on this notice, the memorandum of points and  
13 authorities filed herewith, any supplemental briefs of the parties, matters upon  
14 which the court may take judicial notice, the records, files and pleadings on file in  
15 the above-entitled action, and such further and additional evidence and argument as  
16 may be presented to the Court at or before the hearing on the motion.

17 Dated: March 1, 2012

KRONGOLD LAW CORP., P.C.

18 By: /s/ Steven L. Krongold

19 Steven L. Krongold

20 Attorneys for Defendants

21 Debt Resolution Center, f/k/a Freedom  
22 Debt Center, Debt Resolution Center LP,  
23 and Nationwide Support Services, Inc.  
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